

**FILED**  
HARRISBURG, PA

**In the  
United States District Court For The  
Middle District Of Pennsylvania**

PER

FEB 27 2024

DEPUTY CLERK

**George Ivan Lopez,  
Plaintiff,  
Vs.  
John Wetzel, et al.,  
Defendants.**

)( Case : 3:21-CV-1819  
)( Hon: Christopher C. Conner  
)( Hon: M.J. Martin Carlson  
)(

**PLAINTIFF LOPEZ'S MOVE THIS HONORABLE COURT  
FOR AN ORDER COMPELLING DEFENDANTS TO PRODUCE DISCOVERY**

Now Comes, Plaintiff Lopez, through the assistance of a fellow inmate Orlando Baez, seek an order of this Court, Compelling the Defendants to produce the requested Discovery Material which has a deadline of February 18, 2024. and in support states as follows:

1. Plaintiff Lopez, directs the Courts' attention to the attached Declaration and Exhibits, showing that Plaintiff has made countless of attempts to ascertain copies of the Named Discovery Material (Grievances) that support Plaintiff's Claims and allegations raised in his complaint.

2. Plaintiff Lopez, has repeatedly informed Defendants Counsel Mrs. Kim Adams, that the reasons he dose not have a copy of the grievances, were because during a cell search and Transferred from SCI-Greene to SCI-Phoenix, a box of property came up missing. And these documents (grievances) goes to the heart of the plaintiff's constitutional claims nd allegations raised in the complaint. Plaintiff has repeatedly requested copies afrom counsel Kim Adams to make them available for review and possible coping at plaintiff's. Ms,Adams has refused, stating (Plaintiff

should have kept a copy of the )(Grievances).

3. Plaintiff Strongly believe that Counsel is refusing and denying these documents because they will show and prove that the defendants misrepresented the capital case *terms of confinement*. The Contents of the grievances responses will reveal the true facts that, the reasons and claims raised by the defendants to keep the Plaintiff under permanent solitary confinement, was a lie and misrepresentation of the "Terms of Confinement Statute 4304. See Attached Copy.

4. The defendants grievance responses will show a fraudulent act by the Department of Corrections and Defendants. The Responses also stated that the {only} reasons the Plaintiff was kept under permanent solitary confinement was because he was under a warrant of death. Upon which this was not true, because according to the statute 4304, that a capital case prisoner should be in solitary confinement would be when his warrant is signed, which is for no more than 90-days or sooner, not keeping plaintiff under such harsh conditions for decades. This is the reason that Defendants' counsel Kim Adams is refusing to produce these documents and discovery material see attached Exhibit \_\_\_\_.

5. The Requested Discovery i.e (Grievances) are based on ("Conditions of Confinement")

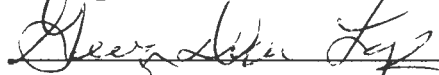
Grievance No: \*1( 296554, \*2) 288365, \*3) 340552, #4) 361711, \*5) 368870, #6) 466422, #7) 597036, #8) 657723, #9) 621607, #10) 708435, #11) 85768, #12) 907683, #13) 529904 #14) 507044, #15) 490324. Plaintiff

ask the Court to also review the numerous amount of good faith letters, plainytiff requesting counsel to produce copies of these grievances and or make them available for review and coping, all to no avail.

6. Plaintiff cannot properly prepare for the upcoming Sumary Judgment and/or finalize his discovery process withou these documents. If Plaintiff would had been represented by counsel, attorney Kim Adams, would had already prodvided these requested documentbts,

Wherefore, for the reasons set forth above, Plaintiff respectfully request that this Honorable Court Grant the requested motion to compell, so that Defendant can produce the requested Griervances, Appeals and responses before the discovery deadline expire and also Order defendant Cousel to provide Plaintiff with a respond to his second set of iterrogatories.

Respectfully Submitted



George Ivan Lopez, CZ-3198

1200 Mokychic Drive

Collegeville, Pa. 19426

1/29/2024

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Certificate of Service

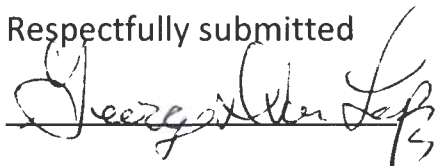
I, the undersigned hereby certify that on this 29th day of January, 2024, Have served a true and correct copy of the attached Motion to compel upon defendants Counsel, via first Class Posstage.

TO: Attorney Kim Adams  
1920 Technology  
Mechanicsburg, Pa. 17050

Verification Statement

I, Verify that all matters set forth herein are true and correct to the best of my knowledge, information and believes and to those matters I beleive to be true, pursuant to U.S.C. 1746, relating to false statement to authorities.

Respectfully submitted



George Ivan Lopez, cz3198  
1200 Mokychic Drive  
Collegeville, Pa. 19426  
1/29/202

George J. Lopez, C23198  
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To: U.S. Dist. Court For  
The Middle Dist. of Pennsylvania  
228 Walnut Street  
P.O. Box 983  
Harrisburg, PA 17108